

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

DANIEL BYRD

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§

**CRIMINAL NO. 4:23-cr-00165-1**

**DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE AND RESET  
DEADLINES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Daniel Byrd, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The case is currently scheduled for Pretrial Conference on September 3, 2024, and Trial on September 9, 2024.
3. Defense and the Government are finalizing the final details of a plea deal.
4. The Defendant has filed a waiver for a speedy trial.
5. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the trial for 90 days or whichever date this Honorable Court sees fit.

Respectfully submitted,

**PAUL DOYLE & ASSOCIATES, P.C.**

By: /s/ Paul Doyle

Paul Doyle

State Bar No. 24011387

Trevor Sharon

State Bar No. 24086579

440 Louisiana Suite 2300

Houston, Texas 77002

(713) 228-9200 Telephone

(713) 228-9203 Facsimile

paul@pauldoylelaw.com

trevor@pauldoylelaw.com

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 28th day of August 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle

Paul Doyle

Attorney for Daniel Byrd

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that on the 28th day of August 2024, counsel spoke to Jay Hileman, Assistant United States Attorney, stating that he was unopposed to this motion.

/s/ Trevor Sharon

Trevor Sharon

Attorney for Daniel Byrd